

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL  
COLLECTION AGENCY, INC.,  
CUSTOMER DATA SECURITY  
BREACH LITIGATION

*This Document Relates To:  
Other Labs Track*

Case No. 2:19-MD-02904-MCA-MAH

MDL 2904

**NOTICE OF MOTION FOR  
ADMISSION PRO HAC VICE OF  
ABAIGEAL D. FRANSON**

**TO:** All Counsel of Record

**PLEASE TAKE NOTICE** that on a date to be determined by the Court, pursuant to L. Civ. R. 101(c), the undersigned attorney for Defendants Sonic Healthcare USA, Clinical Pathology Laboratories, Inc., Aurora Diagnostics LLC, and Austin Pathology Associates (“Sonic Defendants”), shall move before the United States District Court, District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for an Order admitting Abaigeal D. Franson, Esq., to appear pro hac vice in the above-captioned action.

**PLEASE TAKE FURTHER NOTICE** that in support of said application, the Sonic Defendants shall rely on the accompanying Declaration of Bradley Bartolomeo and the Declaration of Abaigeal D. Franson, Esq. A proposed order is also attached hereto.

### LOCAL CIVIL RULE 7.1 STATEMENT

The undersigned hereby certifies that, to the best of her knowledge, no brief or memorandum of law is necessary in support of this motion as the issues raised thereby involve no complicated issues of law.

Dated: May 19, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Bradley Bartolomeo

Bradley J. Bartolomeo

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